

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

No. 7:20-CR-00167-M-1

UNITED STATES OF AMERICA

v.

LIAM MONTGOMERY COLLINS

MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL
MOTIONS AND CONTINUE
ARRAIGNMENT

The Defendant, Liam Montgomery Collins, through counsel, hereby asks this Honorable Court to extend the deadline to file pretrial motions 60 days, to and including January 25, 2022, and that subsequent deadlines in the Court's July 27, 2022 order [DE 225] be adjusted accordingly. In support of this motion, the Defendant shows the following:

1. Mr. Collins was initially indicted on October 15, 2020 and charged with conspiracy to manufacture firearms and ship interstate, interstate transportation of firearms without a license and aiding and abetting, and interstate transportation of a firearm not registered as required and aiding and abetting.
2. Mr. Collins was charged by superseding indictment on November 18, 2020, and by second superseding indictment on June 16, 2021.
3. On August 18, 2021 a third superseding indictment was returned in this matter adding an additional charge against Mr. Collins for conspiracy to damage an energy facility.
4. Pursuant to the Court's order [DE 232], all pretrial motions shall be filed by November 25, 2022, responses are due December 9, 2022, and arraignment is scheduled for January 10, 2023.

5. Undersigned counsel has been in extensive discussions with the Government about a potential resolution of this matter. These discussions have been fruitful and undersigned counsel requests this additional time to continue discussions with the Government regarding a non-trial disposition.

6. In light of these circumstances, undersigned counsel respectfully requests that all deadlines and settings be extended by 60 days, particularly to avoid setting pretrial motions deadline around the Christmas holiday.

7. AUSA Barbara D. Kocher has indicated she has no objection to this request for a 60-day extension.

8. Undersigned counsel respectfully submits that allowance of this motion would serve the ends of justice and such allowance would also outweigh the best interest of the public and the Defendant in a speedy trial in that this extension is reasonably necessary to provide reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

CONCLUSION

For the preceding reasons, the Defendant respectfully asks this Court to extend the deadline to file pretrial motions for a period of 60 days, to and including January 25, 2022, and to adjust the subsequent deadline in the Court's July 27, 2022 order [DE 225] consistent with such an extension, namely: extend the deadline to file any responses to February 9, 2022. Further, the Defendant respectfully asks to continue the arraignment presently set for the January 10, 2023, term of court for a period of 60 days to the March 10, 2023 term of court.

Respectfully submitted, this the 25th day of November, 2022.

CHESHIRE PARKER SCHNEIDER, PLLC

/s/ Elliot S. Abrams

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Retained Attorney for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date shown below, he electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel for the United States, Barbara D. Kocher.

This the 25th day of November, 2022.

/s/ Elliot S. Abrams

Elliot S. Abrams

CHESHIRE PARKER SCHNEIDER, PLLC